

## **Summary of phone discussion 10/25/07 with ABS Seattle Sr. Surveyor C. Shull**

Re: Empress of the North ISM documentation issues

1. Initial audit was 2-04
2. Had outstanding items (non conformances). Client responded on June 10, 2004, completing the initial audit.
3. First annual verification audit conducted March 17, 2005.
  - a. The plan was never sent back to him by Majestic
  - b. He attempted to contact them, but never heard back.
4. New DOC issued with a company change of address from Portland to Seattle
5. ISM initial audit done 2-2-04
6. May 2007, post-accident, company contacted ABS after discovering their DOC was expired.
7. Went forward with Interim DOC due to change of management, and their being a new company.
8. If overdue for annual audit, Houston ABS will notify company.
9. The ABS has no formal system in place to notify auditors of overdue corrective action plans.
10. ABS not obligated to notify company of documentation due dates. Document validity is company's responsibility.
11. Database can be accessed by owners to track document due dates in "Safenet", a service available to owners if they so choose.
12. All companies are set up in SAFENET. It's up to the company to access it.
13. Believes an expired DOC, if discovered during Coast Guard COI inspection, would have been a "No Sail" item.

Brian Curtis  
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Empress of the North Grounding